

**CRAMER DECL.  
EXHIBITS C - C3  
[PUBLIC-REDACTED]**

# **EXHIBIT C**

**FILED UNDER SEAL**

**EXHIBIT NO. 22**

11/30

sundar return to office policy?

insider risk

dr diane/dei

doing better on black+ , women , recruiting, retention, wrt google  
worse on latinx/native american

news

12/3

ads- addtl exercise . jerry + pragh

mitby: 1000 apps use 300 of them....how to make that easy to find/access


- incremental
- moar deeplinks/appify

reengagement / appify / deeplinking

play pass - how to invest

- originals
- evolve

venkat

- 
  - what is/is not payments data
  - decline reasons
  - messaging, changing billing dates....
    - -12% on starz

mrinalini - process for managing deps between us/payments

12/9

sameer

- 0% is currently riot-starting in team, meme of impossible to police.
- either way, who is eligible is the crux. we dont have the kyc needed to a good job. dont even know if it'll be enough (apple associated accounts)
- we probably need IDV, background checks etc.
- hbo asia
- hotstar, wholly owned sub of disney
- constrained by SMB focus. e.g. large dev incentives can serve as disincentive for some of this bad behavior

SQEX builds a spin off tomorrow and licenses some of their IP to this new company, will we go to war?

<https://docs.google.com/document/d/15FjuVbrMiuU-aGHGJjfb7Cxm8A6lrQHtZPz0-ZFFYvY/edit?resourcekey=0-xaao4FXiwuMBXUscsJI5bw>

comp

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED] jan1

prioritize 99% don't pay full

ok w janky rebate approach

"savings to date"

'independent' - ok w hbo asia

? talk to developers....get their instinct (sqenix example)?

- try o draft off apple draconian practices, if any
- if they're applying, it could be really hard/angering small devs

99% is the message that landed well, but will it sustain as program rolls out

lock in something with finance so they're expecting it. might be matching apple, might be more, might be less (may or may not fly)

**make sure steve aligned on plan and options** and how we go to ruth (v easy for sameer to IM)

already communicated it to ruth/philipp

how do you want ot earmark, how might this affect optics of play plan?

governance - pricing team needs to be involved

cristian - how to get 'approval'/ set expectations

1. **ok to delay an announce** until we see how apple actually administers the program and what dev agitation may arise. *[assuming there isn't burning pressure from pr/gapp/dev agitation to do something to match apple]*
2. **we should also do research with developers** to understand how or whether they'd try to do the 'create shell company, license IP to it, launch new app' routine with apple.

3. **we need to set expectations with ruth/philipp.** sameer has pinged them and planted the seed. **we should work with christian and steve** to ensure they're aligned with

[REDACTED]

[REDACTED]

[REDACTED]

4. other random sameer feedback/notes:

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ok, etc?

d.

payments team

- talked options
  - converge
    - issues: who owns, play sufficient control?
    -
  - status quo
    - ngbf, but need needed to created deconstructed bf for us, because we only use some
  - get out of buy flows altogether

bill ready

scott silver - will go w shopping

left w yt , ads, google store

status quo works for us

- if yuo can deemphasize shopping or YT, put it into optimization
  - processing, fops, risk,
- we could take web for digital
  - ios flows
  - ads, cloud

- to retain talent and have enough data
  - everyone will go to apis
  - who wants to do ios
- to bundle

deals

rakuten sourcing/aggregating

? escalation / caesar / pragh

- solve fragmented buy flows
- 
- will happen next week
- shopping - pls maintain api for 1 more yr.

SAMEER

- play pass t mo tuesday

- app squad wtf, camera?

unity

----

gpay - IDV

clover

sagar piracy

app squad

align w mmh on org and culture changes

idfa CY

deals prioritization

org

fix okrs

----

**20210105**

## DECISIONS/DONE

- dei okrs
- Advanced protection OK?
  - half of play pass not in it.
- read up on potassium
- organize around gnosis  
<https://gnosis.googleplex.com/p/ahNzfmdvb2dsZS5jb206Z25vc2lzc2hQLEgdQcm9qZWNoGICAgIjhuYkkDA>
- 

play leads

2441

2695

suzanne

- what does potassium really mean? eliminate cookies, protect ads
- what should my role be - resourcing?
- karthik
  - exec presence
  - ability to drive this big complex thing
  - paradigm shift? from drive/comms to this?
  - potential backfill for my team
  - team fit, xfn influence
- ? pfeng
- android : headed to on-device measurement / tracking

3048

purnima

- sagar feedback....how to operate
- kyc / developers
  - indians, covid, job loss
    - loan apps shady, aggressive collections.
    - needed RBI license
    - hard to see APR due to escalation
- 

pb

- [REDACTED]
- [REDACTED]
- runway
- raising money eom jan.
- FT jan



- HT feb
- start masterclass 1/march
- store - autopilot for 6 monts....
  - new ranking for games
  - deals, mekka, hc
- aaron - good place, stepped up
- deepthi needs to build relatinoshi0ps
  - yabing
  - pf
- gmscore
  - pm/eng issues
  - dominique
- runway
  - needed more alex/kobi...thinking abt the small devs
  - mmh - thought they'd be too easy on devs
  - implementation mtg
  - india mtg
- EU legis
  - aaron?
- get someone for aaron, 1 person for kosuke/marcus
- free 1-200M
  - post-install x-sell, more ads, less organic
  - search page, depth ads
  - deals
- msft
- tablets
  - more ammo to care about large screen
- b\*

6024

sameer/play leads

- 'very good' for play....~350, without XFN, without extend
- plan for 80% (at lower end)
- some may be granted late in year, details
- YT
  - hiroshi / susan
  - 'so much work', nothing of substance. talked to sundar.

**20210106**

**DECISIONS/DONE**

- CSM -> mindy, privacy

- briefed alexi on pb sitch
- saw rubidium, t&s updates

devexp

- privacy
- kyc

rubidium

- who is the director to rally and focus

sameer

- org/culture
  - reorg, people coming loose.
- pb
- 100M cushion
- app squad 1P focus
- fitbit sub lead
- hc
  - 350 to play, epuc/bd,
  - caveats
    - 45 - allocated to extend location
    - 25 - give back to davek. can probably fund the rest of the 60 himself
    - 20% holdback release in october
    - rate card, can trade heads for location
- complexities
  - negatives we've been carrying
- gmscore - slated for 22, under the extend
- unicorn - jen
- dont know what happened to yt heads

**20210107**

runway

rubidium

clover

EU new deal

unicorn

- karthik
  - exec presence
  - ability to drive this big complex thing
  - paradigm shift? from drive/comms to this?
  - potential backfill for my team
  - team fit, xfn influence

20210111

#### **DECISIONS/DONE**

- review hwgpw
- advised pk
- updated leads on stuffs
- 

xfn

- pf, AM conscripted into dsa/dma
  - dsa - moderation
  - dma - p2b 2.0
  - new deal - consumer protection

cultural shift doc

PK 1:1

- ios squad
- PM, mktg, comms, 'central team'
- ? working w maru's team?
- uer to figure out why not engaging w G products . e.g. security w/faceid, multi app use cases
- ? how are 1P teams orged wrt ios vs android
  - much smaller?
  - teams were too NIH. wouldn't use apple's libs
  - much more constrained : easier to dev for....make that 1 way better, rather than giving ppl 10 ways to do it
- 
- contributing some teams
  - search - well staffed, corralling
  - tasks - 1 ios dev, get any help they can get
- apple - only 1 enterprise acct
- 
- 10 ppl CT - 8 eng 1 ux 1 pm
  - trying to id people who would work in a platform capacity
  - comms, pr, mktg
  - catch product teams output
  - needed incentives, company level OKR
- still no exec level view of what we want to do on the platform, no exec sponsor

- e.g. dealing w privacy nutrition label
- 

20210112

TODO

- sameer / hgpw

app quality

- pixel ux
- ios generally more polished
- more effortless across form factors

aaron

- not as forward as m, gh
- shadow of pb
- 

sameer

- jalwa 15 for line 10
- some given away to wear, maybe.
- stadia - fertile recruiting
- jen
  - worried we need full time person
  - paulo nog good at brining people together and getting them over hump
  -

mirinalini

- buyflow
  - kan - getting beat up by bill ready
  - venkat/caesar/bill(?) -> pragh to make call
  - bill: going to force all physical goods stuff to their other buyflow
  - 3 options
    - support deconstructed only
    - bill should handle all physical, play should handle all digital
      - g1?
    - single consolidated flow across all of google
  - gpay logo. caesar told stop. thought it was only india. we thought global
  - restitution ph 1 - current, ph 2 - new cases. ph2 not on track. kftc pressure
  - trade off br comp vs restitution
  - not enough vis to understand tradeoffs

20210115

hareesh

play pass funding

gc, fop ownership. XXX doug

big nums, 1M ppass. subs 100M

42eng years disingenuous, and play would have to take that cost and put billions at risk

[illegible]

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

[https://docs.google.com/document/d/1O\\_imfkvktVnOUYZGm4Y5sKkiiTy2L\\_bx\\_vekft\\_eYU/edit?ts=6001e875#heading=h.3ujjs2gsnr1n](https://docs.google.com/document/d/1O_imfkvktVnOUYZGm4Y5sKkiiTy2L_bx_vekft_eYU/edit?ts=6001e875#heading=h.3ujjs2gsnr1n)

20210119

- thx for making time
- huge thx to teh teams working behind scenes to distill into 10 slides.
- put landability aside
- focusing on principles first

- legal advice
- discussion is complicated and easy to get derailed. we had a structure in mind so we're going to try to adhere to that.
- only 10 slides of dense info

20210120

inauguration day

sameer

- damion et al
- see issues first hand
- strat roadshow w sabrina/seang
- cros update
- tablet
  - XXX DEBUG OHANA , DUMBLEDORE, B\* ASK
- hc
  - steve +9

perpetually positive

runway/sr leadership

- transparency as principle
- CN app store approach...50% for discovery etc
- sameer
  - existential issue: will this stop anyone from complaining
  - need to have billing optionality
  - like more transparency. what is the way this would be explained to world
    - integration requirements stay? or is everyone in?
    - making people pay that weren't paying
    - do we need more enemies? only 125?
    - misaligns us w devs
    - dev fee can be levied
      - hobby developer license
      - tiers of support
  - very google - rational, cerebral, legislators/regulators need bitesized takeaway
- jamie
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]

deepthi

- strategy
- runway
- clover

[REDACTED]

- 
- | Relationship Duration | Percentage of Respondents |
|-----------------------|---------------------------|
| Less than 1 year      | 85%                       |
| 1 to 2 years          | 75%                       |
| 3 to 4 years          | 70%                       |
| 5 to 6 years          | 80%                       |
| 7 years or more       | 95%                       |

store process

- 2 teams own
- walk up chain to get guidance
- working on different goals - ipd / interstitial rate
- not enough escalations

clover/sameer

- status...b\*

runway/sameer

- ? bulk
  - step back
  - 
  - 
- as a vector
- 20% narrative
    - soundbite
    - ags/epic/eu - meh?

- is it worthwhile doing up front
- how to integrate jamie's team. without pissing current team off.

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED] carousel

jamie

sameer/cl

- emu
- storex
- better together
- commercials

pb

- tingmui - ATC betw howard + mrinalini
- debug 2 pager games vision. w greghart
- damion - sundeeep
  - pms under him being too territorial/dictatorial
- OKR review
  - 'my business requirement'
    - authoritative influence approach. doesn't want to convince engineers
  - incremental review w sameer
  - GTM fighting over 50 vs 500
- distribution - not allowed to say no
  - 10-ish

pk

- focus on regulators - defend or make peace ?
- you got a business idea, we have a business model for you. we want you to be successful
  - dont simplify, be comprehensive
- stores - as a nother dimension



sameer

- play store for wear

AGG review

? how to for load times. journey for debugging perf, etc

sameer passdowns

sundar

whatsapp

privacy

nutrition labels, ATT

thoughtful approach, but apple more aggressive

better together importance

- erik. bluetooth, everything that would be common in all the better together scenarios

pf

- risk hc
- compliance hc ask - heard it was granted, but laura F claims not to have received.
- 
- 

go/play-loyalty-datasite

damion

- andy took on scope and then...

[REDACTED]


[REDACTED]

FEB

alexm

- over index on impact/numerical impact.
- focus on KSAs.
- bias to execution rather than strategy

mainline

- android: op pain. not staffed for operations pain
    - first place to collab, release tooling & operations
  - graduating code from gcore to framework
  - mainline focus on aosp
  - gcore focus on 1p dev velocity
  - what to combine
- 

sameer

passdowns

- s
  - dramatically improve privacy narrative
  - big narrative at io
  - potassium, assistant, privacy nutrition labels
  - robinhood, how stuff rolls out/fans out/butterfly effect. if not careful, always in any cycle related to online svcs
- 
- better together, phone + watch
- dei
- maru joining sameer's team
- feb 9 - sabrina/glen updating on silk

- feb 16th - roundtable type thing

wear - slsi, faster than tizen, smooth,

kosuke

- redone all content in store, all formats, all surfaces, just about everything that's not ranking
- gets more value out of existing real estate
- created app hero card, used less pixels, more effective

alignment

- 65 execs, aligning on company vision and okrs
- 5 days. 2.5 days was actually focused on mindfulness
  - mindfulness
    - listening, being empty
  - language
  - trust
    - rackets

nelson

- collab/perspectives

2/8

[REDACTED]

2/9

passdowns

- ~60 mins assistant review
- 60 mins pixel review w sundar/hiroshi/rick last thursday
- sundar said @ gleads ....recap, v well done, excited, great review
  - pixel android 2021
  - what are the spaces on the mobile phone going forward
  - assistant
    - voice strategy
    - gboard dictation ++++++ responsiveness, grammar, punctuation, gmail, warm words (stopping alarms, from lockscreen etc)
  - smartspace
    - at a glance (next mtg etc)
    - positioning as what assistant thinks you should be doing right now....postit right in front of you
    - at starbucks - loyalty card, at airport - boarding pass etc
- silk/material next
  - leak. partner. out of date, inflight
  - silk - make android modern & reliable. color themeing, ssytem spaces.
    - visual ssytem , IA update to all spaces
    - everything is getting an update
  - material next
    - systematicization of that
    - more app side
  - fewer jumpcuts
  - 4 core spaces
    - quick access
    - attention

- smartspace vs notifications. help you based on context. extension of notifications
- yours
  - home screen. your mess
- everything
  - all apps. search. sortable/filterable. when in doubt go here. 1 index
  -
- coarse gestures

2/10

sameer

- feedback on the ux session
  - headed in right direction
  - just need next level of detail to expose thorny issues
  - how will teams really make decision of what makes it onto the ux
  - will consumers understand it
  - runtime dialgos turnin ginto tos
- pragh mail
- family review. mindy/paulo/mmh/tian/rafa
  - bengomes, jen, johanna, ssamat, apps team council. accepted
  -
- material next challenges, sufficiently plugged in?
  - read in on jetpack
  -
- clover
  - 'no penalty', defensive move. THERE IS A PENALTY



[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] timeline

----- CLOVER HC -----

Tian Lim, Yesterday 2:33 PM

re:hc and doing B\* and clover....i think we need to more clearly articulate, in the b\* case, how much more hc needed, for how long, and why (TAM + tablet strategic value + revenue)

for clover, assuming we scrambled all the jets onto it, i'm unclear as to what the resourcing gaps are (sorry i don't have the latest decks if they're there), and for which teams (e.g. i'm pretty sure android is a big hole), and what the sequencing for MVP launch would look like

\*resource sequencing for MVP launch

Aurash Mahbod, Yesterday 2:35 PM

What's the right forum to get signal on clover funding even without the backwards compatibility piece?

Tian Lim, Yesterday 2:35 PM

jamie is going to raise the issue w sameer tmw morning

Aurash Mahbod, Yesterday 2:35 PM

Sorry lag.

Ok sounds good

Tian Lim, Yesterday 2:35 PM

but not sure he knows what the number is, or where the holes are (play vs android)



[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

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[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

Tian Lim, Yesterday 2:40 PM  
and what level of security model you think is implemented by october?

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

The old estimates aren't probably accurate enough because they were high level

Can put something together with more detail now that we've had convos with them



[REDACTED]  
[REDACTED]  
[REDACTED]

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\_\_\_\_\_

[REDACTED]  
 [REDACTED]  
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[REDACTED]

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[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

\_\_\_\_\_

\_\_\_\_\_

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\_\_\_\_\_

Bar Index	Approximate Length (%)
1	45
2	100
3	65
4	25
5	75
6	95
7	100
8	98
9	55
10	70
11	50
12	100
13	98
14	35
15	95
16	100
17	48
18	98
19	82
20	98
21	58
22	28
23	100
24	65
25	98
26	18
27	42
28	38
29	98
30	72

Tian Lim, Yesterday 2:55 PM  
or you install the signal desktop app ☐

Aurash Mahbod, Yesterday 2:55 PM

ha ha

that example applies to all apps that use background services

~most apps in the catalog

□

just illustrating the point

Tian Lim, Yesterday 2:56 PM

yeah just being snarky

Aurash Mahbod, Yesterday 2:57 PM

i can enumerate a bunch of these if it helps bolster

Tian Lim, Yesterday 2:58 PM

(trying to decide what it's worth to try to overload my brain on this)

Aurash Mahbod, Yesterday 2:59 PM

lol

Tian Lim, Yesterday 2:59 PM

(as i listen to rubidium mtg)

Aurash Mahbod, Yesterday 2:59 PM

tldr, there are a bunch of examples like what i mentioned

ha ha

in general the thing i'm worried about is that we kind of need a blank check on this

with some sense of what that upper bound is

i'd advocate for an approach like t his

we tell sameer / hiroshi this is ballpark what we need ceiling

we can come to advocate for 50hc blocks to unlock

or some such arrangement

[REDACTED]

Aurash Mahbod, Yesterday 3:07 PM  
(sec brb)

[REDACTED]

[REDACTED]

Aurash Mahbod, Yesterday 5:42 PM

I'm just confused what the plan in Hiroshi and sameer's head is

Greg Hartrell, Yesterday 5:42 PM

moar product, less people!

I'm kidding

Aurash Mahbod, Yesterday 5:43 PM

Hiroshi wants to move forward - was he really thinking we could handle this from existing resourcing?

(not expecting an answer just asking the obvious question I want his feedback on)

XXX PWESTBRO is able to do a lot of the port...what changes...why is android involved

—

alex

library - not TOO attractive & lucrative

- distro fees
- billing choice (or not)

GOOG-PLAY-007021389

second -- related -- Hiroshi did not even like the idea of a difference in surfacability -- he wanted a single bar  
I thought the bifurcated store idea was a good one, although I preferred the option we workshoped around limiting discovery (that is what I mean by surfacability -- I'm multitasking)

*just concerned with the pandora's box of developers seeing that they are in the alley and not in the nice part of town*

Tian Lim, Yesterday 2:23 PM  
double click?

[REDACTED]  
[REDACTED]  
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[REDACTED]  
[REDACTED]  
[REDACTED]

—



glance scaling outside of india, content, monet  
60c arpu/yr, 50% w oem  
liveops, deals,  
cant scale to work w devs  
?admob

----

what's not ok

- malware
- deceptive practices

wilson

- privacy
- competition
- 

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flipkart india tablet  
pranav?

----

kara - focus on 2nd purchase.  
growth? strategy?  
where is this happening and why can't i see it?

sameer

ar/fb

amzn/fb watches

geist

dei hiring at leadership levels

googlegeist

overall ppt ratings up slightly

4 min

highlights: (1) biggest surprise on positive perf sentiment lift (despite everything) (2) feeling of connection/belonging up despite wfh, (3) well-being at an all-time low (but higher than the informal non-ggeist rating of this from back in April)

1 min

and finally, (4) way down on hierarchy/bureaucracy/getting things done (with notably v low scores by VPs/Dirs - perhaps being sandwiched and feeling it most profoundly; I can relate)

re the new future or work questions.... for questions asking which location (home/office/no pref) was best for which activity/attribute, e.g., connecting, well-being, concentrating, etc., mixed response across the 3 choices for many, indicating that this is a very personal/individually unique assessment, so Googlers expressing desire to have more say (and asking leadership for more trust) in ID'ing where/how they work best and achieve the most

[REDACTED]  
 [REDACTED]  
 [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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world changing issue -> change course?

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

- 1) get clarity, on larger strategy
- 2) get certainty

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ngbf

3Ps. doordash

what backend integrations expected. order/terms consistency?

subscriptions for 3Ps?

analytics available

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[REDACTED]  
[REDACTED]  
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jenny perf

[https://grow.googleplex.com/role-profile/detail/JSF\\_PEOPLE%20PARTNERS,1456,1457](https://grow.googleplex.com/role-profile/detail/JSF_PEOPLE%20PARTNERS,1456,1457)

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3/2

sameer

march 4 google-wide townhall

march 8 vps w 100%, autoshare

sundar io.

focus on android ui change.

privacy g-wide

- concept of 'safe sensing'.

march 12 - half day privacy summit

- gapp - state of world, mktg shift narrative
- sabrina/sagar/dave/sfrey....

[REDACTED]

|

[REDACTED]

[REDACTED]

|

[REDACTED]

|

[REDACTED]

[REDACTED]

|

[REDACTED]

behind on hiring

msft. links.

SAMEER

tablet

- specific features to store...will ppl disappear
- merch, aquality, badging....
- devconsole? just nice to have?

ddore: raise round of funding? wheres the data? adding to team without knowing were on the right path

supersize kids apps ? bd work?

how big is it going to be? going to be downloadable. whos the vision, are all the pieces going to be there to pull together.

long term plan for tablets.

whos lead? instead of taking orders

—

[REDACTED]

—

GKS baseline 20k  
to 2M

family positioning of tablet changes adoption  
US: assistant device, lower



most new stuff is family oriented

not good fro distance learning

top 10: zoom + google meet

----

sameer

store / deals

update on s&d in store

reviews, robinhood

b\*

play's io story.

playpass story?

-----

Deals:

We have divided work into 5 work streams and have various owners driving each:

1: Deals Strategy (Kosuke with help from digvijay (growth), joe (commerce), and cindy (ads))

2: Overall Deals Tab Experience (Kosuke & esther (UXD) and bryan (UXR))

3: Developer & Partner Story (PDC-LON)

4: Go-To-Market Strategy (Strat Ops - Dhruv)

5: Eng infra design (Ming) The team is meeting for a design summit to bring them all together next Friday and is planning a PPS to update on progress by end of this month.

— aaron

- launching aug, dovetail, super confusing
- 

—

vp forum

- play prominence
- sustainable value creation
  - [https://docs.google.com/document/d/1MwTOvjEtZ2Ls\\_ZnS3Rh2WxD6y5mUTY7ew3rX8cACW3E/edit?resourcekey=0-DVGG-acV1DlvMjhsGo0L4g#](https://docs.google.com/document/d/1MwTOvjEtZ2Ls_ZnS3Rh2WxD6y5mUTY7ew3rX8cACW3E/edit?resourcekey=0-DVGG-acV1DlvMjhsGo0L4g#)
  - focus on free cash flow
- central finance weigh across pa
  - but opp cost different
- managing hc. exchange rates

sameer directs

sundar, moderation, 25th

- alert to potential controversy

gleads. sundance launch. ads not using 3p cookies

- generally happy
- some influencers not onboard
- really complex...ppl dont understand floc etc.
- working on microsite
- need to simplify explanations

browser convos....privacy as feature....we try to make them built

in/background, but we need to be more forward and make it clear how much we protect people

mozilla shield animating when it does something for you  
need to take credit

no april fools

royal - insider risk. 2020 - was acs. 2021 + = movement of data and what we do with the data

[REDACTED]

DEI accountability

SUNDAR/B\*

- games as 12B
- mobile to desktop
- simplify story even further
- 5review game theory
- give breathing room
- break the play/android linkage? maybe touch on chromeos....we did chromeos....thats how this started.

[REDACTED]

[illegible]

- store utility
  - backup / restore
  - onboarding flows
  - my apps and games
  - search

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calibration notes

team leadership

- double clicking into vision and spreading the gospel

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

- real money gambling - finally went live, though not perfect. somewhat policy-bottlenecked. assigning one of my PMs almost full time to it to keep this moving. purnima and i personally engaging with RMG developer community to formulate next wave of policy.
- blockchain investigation - with purnima ran roundtables with blockchain luminaries/players such as dean takahashi, founders of tron, etc. to understand the space. ultimately decided not to invest here.

advisor to

- android games/graphics. katie has really taken this over and greg is sufficiently ramped that i have stepped back
- play/stadia conversations (both the conversations at end of 2020, and the new business model conversations in 2021)
- yt/play rewards
  - YT to migrate to play infra for lootdrops. allows us to for e.g. quantify what happens to retention/engagement for viewers who take lootdrops.

-

gleads passdowns

3/16

runway

google economic impact

return to office

1999 2000 2001 2002

[REDACTED]

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**■** [REDACTED]

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© 2006 The Authors

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[REDACTED]

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11/11/2016

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■■■■■■■■■■

- sub platform
- close to systems design, architecture

- user facing

-----

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

----- NATIVE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

████████████████████  
████████████████████  
  
██

??? google translate

#### testing

- 6-8 months. ppl hacking language configs. to practice language they were trying to learn/losing.
- easy monet - practicing language while just chatting w practiced language
- rather than keyboard paring
  - autodetect language on fly
  - translate across all recipient languages simultaneously
  - 10k ppl.
  - analysis engine. 3 benchmarks -
    - get to contextual translation. rather than purely mahemtical approach.....leveraging ML chips on new devices., how you codify speech...vernacular....translate intent & meaning across parties
    - confidence score of lang autodetect
    - quality score of translation
    - sentiment score
- pre-seed
  - nov 2019
  - private alphas / betas, march2020-dec, public beta
  - just starting fundraising
    - angels, maybe get a vc
  - GTM/customer base
  - small business innovation research program
    - innovative startups -> agencies...USAF.....dont dilute.
  - need about \$500k
- built everything for 300k.....bootstrapped.
  - brought in 135k
  - susan/salesforce....bg in linguistics. helped connect to zendesk, globalizaiton/localization.
- applying to ycombinator
- mixpanel for front end analytics
- 500 ppl in public beta
  - 60/70 DAU, 4min engagement/day
- interviewing: like the native experience, need media sharing.....

- driving deeply w communities
  - direct to channel invite

-----

rmg

- easy thing for ios
- real user pain / state...have to clarify
- claws rigged?
- what is the next thing you are going to do?
- india - vouchers, sell in other apps
- does skillz need a license? does it have to be by geography?
  - not variable payout
  - fixed pay in
- how area they protecting users, e.g. when casinos stop when there are danger sign
- apple is arms length....how does apple treat them?
- supercell
  - need a license...how many are given?
  - ppl have to be motivated

geist

execution

- univision + meteors destroying the plans
- holding onto plans too much
- not enough funding for initiatives....deep debt
- speed - ability to make quicker decisions

NEED WORK TRACKING ON THE METEORS/SUSTAINED WORK

- paulo: conviction on top priorities
- AM: siloed list of priorities sagar/sabrina/play

sameer passdowns

- gleads. wellbeing. geist fb. yt thinking of moving ot focus fridays.
  - cancel 'most' meetings
  - should figure out RTO before big recurring programs
  - should do one off things, but don't do anything that could calcify into a permanent position
- ratings / calibration
  - we have more EE+, dont use NI
  -
- net importer of VPs

glance

- ss
  - re-engagement
  - app install
  - economics?
  -

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

pf:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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role

- [REDACTED] [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
- [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED] into rest of app

org

- connections - feed sharing
- communities - groups
- entertainment
- mktplc + commerce

want ppl to run fb app in collaborative fashion

what do you need this person to do

composition - strong leaders but lost excitement about going deep into market to find edge.

product objectives

- [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
- [REDACTED]

misinformation

- whose responsibility

culture

what sort of person are you looking for , your best working relationships

- leader - adapt to what people need. spectrum of people. very different kinds of good working relationships
  - mission : see magic in ppl, shine a light on it
- common thing: relationship that is direct, transparent, mutual trust

- coach

what have you learned from the interviews thus far

- surprisingly hard to find strong vision/POV
- need inspiring leaders
- liked: ppl who tend to demonstrate have an idea that was contrary to mkt / ceo was saying- conviction
- consistent execution excellence
- credibility

what does the work look like

- what kind of work goes on in the silo, what are the dependencies to other parts of the company
- who's doing this work now?
- how much does mark zoom in here

- 100  
 90  
 80  
 70  
 60  
 50  
 40  
 30  
 20  
 10  
 0

NATIVE

- [illegible]



[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

—

pps summaries

games -

[https://docs.google.com/presentation/d/1146ZmYkaaExTSV\\_9TM6tc9bjgRcqPCI741mZG5zs88Y/edit#slide=id.g9f039f7ee6\\_0\\_369](https://docs.google.com/presentation/d/1146ZmYkaaExTSV_9TM6tc9bjgRcqPCI741mZG5zs88Y/edit#slide=id.g9f039f7ee6_0_369)

- game dashboard progress, pretty awesome with one click youtube live streaming
  - and pixel 6 performance fixes
- gamecore (android game development kit) update
- cool new concepts for takeovers on details pages for liveops & events

play pass -

[https://docs.google.com/presentation/d/1nfPL8paA\\_Do5YNqX1BipGSjggFVZneVBIR7wUnSypSk/edit#slide=id.g728d6e36d4\\_3\\_267](https://docs.google.com/presentation/d/1nfPL8paA_Do5YNqX1BipGSjggFVZneVBIR7wUnSypSk/edit#slide=id.g728d6e36d4_3_267)

- updates on global performance and product improvements
- global launches have generally been in line with expectations in terms of free2paid

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

dev console sdk program-

[https://docs.google.com/presentation/d/1m-ZNM7M4x4gWYcEtoKDpydAeJOwWkfjA3lW3ZpVySUg/edit#slide=id.gbd2a1c7c5f\\_0\\_2](https://docs.google.com/presentation/d/1m-ZNM7M4x4gWYcEtoKDpydAeJOwWkfjA3lW3ZpVySUg/edit#slide=id.gbd2a1c7c5f_0_2)

- v1 launched in december 2020
- already have 24 SDK accounts opened, covering 68% of top ads sdks by installs
  - allows sdk owners to report versions as outdated, see metrics on install stats and crash rates
- discussion on proposal for 'public index' of sdks (very early, lots of controversial points)

lower priority for you

updating android/play data access policies for google 1P -

[https://docs.google.com/presentation/d/1oTj4ei31\\_nsXz2egwOLRokcTGavOOyWinWpHbr3rpZs/edit#slide=id.g64b27372bf\\_0\\_66](https://docs.google.com/presentation/d/1oTj4ei31_nsXz2egwOLRokcTGavOOyWinWpHbr3rpZs/edit#slide=id.g64b27372bf_0_66)

- our principles seem to be good, some risks and tricky situations in process of being managed (e.g. magic eye, one google dashboard)

store personalization for games home-

[https://docs.google.com/presentation/d/1IVmBBdOXhYqdxGlcDqIKY97nWAYe6dTKrz3y\\_y5CFpC/edit#slide=id.p](https://docs.google.com/presentation/d/1IVmBBdOXhYqdxGlcDqIKY97nWAYe6dTKrz3y_y5CFpC/edit#slide=id.p)

- covers smattering of topics, but most impactful is the new timespent 2.0 north star metric, which is far more correlated with long term retention

new store segmentation -

[https://docs.google.com/presentation/d/1wsK0kFM2WBLKwDPGVldnzB2\\_kcQMsL1RygA\\_2ad3yzM/edit#slide=id.gb116af2712\\_1\\_323](https://docs.google.com/presentation/d/1wsK0kFM2WBLKwDPGVldnzB2_kcQMsL1RygA_2ad3yzM/edit#slide=id.gb116af2712_1_323)

- WIP, early take on research we ran last year to try to hone in on new key markets (e.g. ID) with a bent towards trying to understand level of mobile literacy

in-product user feedback -

[https://docs.google.com/presentation/d/1clVWqpbLr1fyU6kqp08MchtXFTs1ySYIIPZ-3Dwhucl/edit#slide=id.gbc95f539fe\\_1\\_22](https://docs.google.com/presentation/d/1clVWqpbLr1fyU6kqp08MchtXFTs1ySYIIPZ-3Dwhucl/edit#slide=id.gbc95f539fe_1_22)

- we want to start running surveys in phonesky to get direct feedback on quality of experience

---

**Redacted - Privilege**

# Redacted - Privilege

---

aaron notes

dont understand goal

too fast, hard to follow, too many pronouns

VO too verbose. and i think the key points were buried there and not on slide

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

----

[HEARING]

<https://docs.google.com/document/d/1ou1HOsAC1okMMVPeLWkwXq8qN6rCH1GgqKi6injTyQ8/edit>

Tian Lim, 33 min

more seriously, so i can plan a little, how much of my cal do you expect to get detonated for prep?

Kareem Ghanem, 17 min

My expectation is: a couple of hours this Friday, then 2 half days and one full day next week, then one full day on the Monday before your appearance.

Tian Lim, 16 min

and lots of studying ?

Kareem Ghanem, 16 min

You're going to be well prepped and you're going to be fantastic, btw

Kareem Ghanem, 14 min

Yes, there will be study as well. But I also see alot of this as your professional sweet spot. This is about digital content distribution at the end of the day, and you're the guy on these issues, with a career spanning so many of the major platforms.

So we'll coach you but also want you to speak with the authority and humility of someone who knows this in and out already

Tian Lim, 12 min

appreciate the votes of confidence. do we know who apple is sending?

Kareem Ghanem, 7 min

Not yet

They suggested a compliance executive /legal rep. Not sure if they'll stick with that. (It's a bad idea for them to go that route.)

Btw, for that meeting tomorrow, it sounds like the RIT team wants to take your temp on some of the non-billing/product/business questions you might get asked, eg Parler.

Tian Lim, 5 min

yeah i'll need to get re-read into all those escalations and the decision making/talking points

[REDACTED]  
[REDACTED]  
[REDACTED]

Tian Lim, 4 min

who should my primary GAPP/legal POC be in general for this hearing?

Kareem Ghanem, 1 min

For GAPP, it will be AJ Bhadelia and Frannie LaSala. Rick and I are supporting, but AJ and Frannie are primary POCs. For Legal, it will be Lara Kollios and Kate Smith. Tristan is supporting, similar to the role Rick and I are playing for GAPP.

—

hearing questions

- how much can i use my opinion/experience. e.g. google's privacy focus
- 

get up to speed on io messages

\*\*\*

GOOG-PLAY-007021422



**Redacted - Privilege**

# Redacted - Privilege

lei convo

Tian Lim, 11:48 AM

hey man, long time no talk.....qq....are CN app store fees still hitting the 50% mark? or has that dynamic changed?

Lei Zhang, 1:05 PM

Hi Tian, in general yes. There were cases where certain developers for certain titles) were able to negotiate it down to lower fee (~30%) but those were anomalies.

Tian Lim, 1:13 PM

you have a deck or doc detailing how/why prices escalated so much?

Lei Zhang, 55 min

Not exactly what you are asking for, but this might help. I did a brief summary of Huawei app store a while ago, mostly still valid:

[https://docs.google.com/presentation/d/1J6GCoxF75Ni4HMKO0ERK9ustATc-vv5J\\_tmvllirF\\_w/edit#slide=id.p](https://docs.google.com/presentation/d/1J6GCoxF75Ni4HMKO0ERK9ustATc-vv5J_tmvllirF_w/edit#slide=id.p)

# Huawei App Store

## Business Analysis

---

### Huawei App Store

What really matters to Huawei store's business is slide 6, Market co-op model 市场联运

And there is link to a Market Co-op Service Agreement, which has a table describing a rather complex revshare scheme

<https://developer.huawei.com/consumer/cn/doc/20204#h1-1611915875593-2>

For different category of apps/games, Huawei offers different revshare (e.g. edu 20/80, paid 30/70, outside of China 30/70 etc).

But what really matters to their business - F2P games - it is 50:50.

Tian Lim, 50 min

thx and i'll study those....but do we understand how/why stores were able to drive fees up that high?

(context: i'm preparing for senate testimony □. )

Lei Zhang, 50 min

Aha

Lei Zhang, 40 min

Not sure this will help the preparation, but IMO it's simply they CAN, for several factors: 1) they (at least OEM stores) dominate distribution on their devices 2) lack of anti-competitive regulations in China (at least difficult to apply to app distribution given each OEM only owns x% of the market share) 3) complexity of market dynamics - app/game devs are also in dominating position in their respective domains (e.g. Tencent in gaming and social)

The last one might be something helpful?

Tian Lim, 38 min

well i guess i'm trying to say ' hey if you open up app stores, you end up with china where the costs are 50%'

but i wanted to see what the driving forces are, sounds like i can't really say it.

Lei Zhang, 35 min

Hmmm. I don't think there is a logic between open up app stores -> fee will jack up to 50%, because the primary driver is domination in their respective walled garden.

Maybe on the flip side, we might be able to say, even in a high competitive app distribution environment as in China, fee is still as high as 50%?

Tian Lim, 33 min

yeah

Lei Zhang, 33 min

Therefore, at least more app store might not necessarily benefit devs in that regard.

Lei Zhang, 31 min

But if the hearing committee dive deeper, it's difficult to argue that there is a lot of friction in China, therefore not necessarily a free market.

Lei Zhang, 28 min

Well, maybe there is something there

Can we say the existence of Play prevents Android OEM forming app distribution domination in walled garden based on their devices.

We've seen in China, when such domination exists, app distribution fee can jack up to as high as 50%, because Android OEMs want to use this business model to compensate the thin margin of their hardware business (which actually is the root cause to answer your question).

Supporting that argument, most of the top Android OEMs are from China, where they already demonstrated this practice.

And we can check Samsung app store's terms in China too.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tian Lim, 22 min

that's crazy. what does tencent charge?

and how do those 2 appstores get distribution?

Lei Zhang, 21 min

sideloaded

I need to check Tencent app store's terms.

Tencent app store (myapp) had a long history, technically it needs to be sideloaded, but that's technical terms, not user acquisition strategy.

Lei Zhang, 13 min

Tencent app store's rev share is a bit more complicated, given they are also a publisher (with 50% of the total CN market share by revenue).

On paper, for the most lucrative sector (F2P online games), it says 60:40.

<https://wiki.open.qq.com/wiki/%E5%90%88%E4%BD%9C%E6%96%B9%E5%BC%8F>

But there is also a footnote says, there is a fixed 25% Android distribution cost, rev share is after that (i.e. on 75% of total spend).

In short, Tencent is robbing developers, as summarized in this article. □

<https://xueqiu.com/2919738071/116034659>



[腾讯游戏的商业模式（转） 一.商业模式 1\) 合作模式 腾讯游戏分自研和代理两类 而从代理角度而言，又分为开放、联运、独代三种合作模式。1.1\) ... - 雪球](#)

[xueqiu.com](https://xueqiu.com)

Tian Lim, 9 min

so funny. NO default distribution AND they charge more /facepalm

Lei Zhang, 9 min

Yep, true capitalism.

I feel the angle of Play preventing OEM store dominating app distribution and jacking up fee as in China makes sense.

Tian Lim, 7 min

probably too subtle for committee tho

but i'll note it and see if the hill team wants to use it

Lei Zhang, 6 min

Ok. Btw, the reason why Apple can maintain at 30% is that their hardware margin is much higher than Android OEMs.

Maybe we can also find Xiaomi's ipo prospectus, to see if they state services (primarily store) as a key business model.

Tian Lim, 5 min

does xiaomi's store show up in US?

Lei Zhang, 4 min

It should, if we have a Xiaomi overseas device.

Tian Lim, 3 min

i mean if i buy xiaomi off amazon, will it have their store?

Lei Zhang, 2 min

I believe it should, but can't guarantee.

<https://moma.corp.google.com/person/patrickpan>

Patrick manages Xiaomi and should know this better

Btw, he was from Xiaomi

Hope this helps a bit. Good luck with the prep and happy to contribute more.

Tian Lim, Now

thx for all the perspective!

Lei Zhang, Now

For sure

--

io

inside android/mobile. privacy/security. wear. samsung/wear

**sameer 4 priorities**

- landing io. incl rubidium
- pixel 2021
- wear/rohan
- play business model changes/tian testimony

purnima

- foldables/tablets. starting a weekly pipeline review for app dev efforts
- weekly update on this

running teams - try to have loosely typed set of time dedicated to reviews with teams. can be decision/guidance/whatever. good notes, good decision log, clear decision makers,

—

1. prioritize DAU
2. addtl HC, articulate benefit
3. follow up on b\*

----

ssamat

[REDACTED]  
[REDACTED]  
[REDACTED]

b\* bits to eap, hiroshi update 4/15

- sundar - [REDACTED]  
[REDACTED]  
[REDACTED], unclear plan  
[REDACTED]

wfh situation

- pops? P&E wide...
- what will happen to culture if no office?
- google defined by smart ppl, innovation, not the products (diverse hits), mostly deep cs stuff. how much of that are you messing w wfh
- dont know what you ruin



- world has changed, not founder, wheres signal on where culture will go

-

[REDACTED]

[REDACTED]

-

[REDACTED]

[REDACTED]

-

[REDACTED]

-

[REDACTED]

-

play pass india;

-

maru devrel alignment

# **EXHIBIT C1**

**FILED UNDER SEAL**

**EXHIBIT NO. 24**

1  
2 UNITED STATES DISTRICT COURT  
3 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
4 SAN FRANCISCO DIVISION

-----X  
5 IN RE GOOGLE PLAY STORE Case No.  
ANTITRUST LITIGATION 3:21-md-02981-JD

6  
7 THIS DOCUMENT RELATES TO:  
8 Epic Games Inc. v. Google LLC, et al.,  
Case No: 3:20-cv-05671-JD

9  
10 In re Google Play Consumer  
Antitrust Litigation,  
Case No: 3:20-cv-05761-JD

11  
12 In re Google Play Developer  
Antitrust Litigation,  
Case No: 3:20-cv-05792-JD

13  
14 State of Utah, et al., v.  
Google LLC, et al.,  
Case No: 3:21-cv-05227-JD

15  
16 Match Group, LLC et al. v.  
Google LLC et al.,  
Case No. 3:22-cv-02746-JD

-----X  
18 \*\*\*HIGHLY CONFIDENTIAL\*\*\*  
19 REMOTE VIDEOTAPED DEPOSITION OF  
20 RUTH PORAT  
21 Date: Thursday, September 15, 2022  
22 Time: 8:11 a.m. (PDT)

23  
24 Reported by: Fran Insley  
25

1 Porat - Highly Confidential

2 A. Do I use chat? Yes, yes.

3 Q. And do you typically chat with  
4 Google employees during meetings where you have  
5 questions about the substance of those  
6 meetings?

7 A. No. I typically use chat as a way  
8 to basically get people to get on video to  
9 speak live, figure out availability. It's more  
10 random.

11 Q. Who is Mike Herring?

12 A. Mike Herring was the -- we call him  
13 the business finance officer's equivalent of  
14 CFOs for platforms and ecosystems back in 2019.

15 Q. And what were his responsibilities  
16 at that time?

17 A. He would have been responsible for  
18 the overall organization, Platforms and  
19 Ecosystems' finance team, and at the time I  
20 believe he was also responsible for the finance  
21 team that covered our G&A functions, general  
22 and administrative functions.

23 MR. CAMERON: So let's mark a new  
24 document. This is going to be, I believe,  
25 Plaintiff's Exhibits 1612.

1 Porat - Highly Confidential

2 (Whereupon Exhibit 1612 was marked  
3 for identification.)

4 MR. CAMERON: So this is a document  
5 bearing Bates stamp GOOG-PLAY 008706724/  
6 725, and it's a message exchange between  
7 Mike Herring and Ms. Porat that in the  
8 title is referenced June 20, 2019.

9 Q. Do you see that, ma'am?

10 A. I do.

11 Q. Have you seen this before?

12 A. I do not recall seeing this.

13 Q. You see that this is a chat exchange  
14 between Mr. Herring and you; is that right?

15 A. Yes.

16 Q. And this is the normal form that  
17 chat exchanges take when you have used them in  
18 your employment at Google?

19 A. I am not accustomed to seeing  
20 something in this form, but it looks like  
21 something in chat.

22 Q. And you'll see there's a reference  
23 to a name and date stamp next to the name  
24 showing when the message was seen, right?

25 A. Yes.

1 Porat - Highly Confidential

2 Q. So this exchange occurred June 20 of  
3 2019. Do you see that?

4 A. Yep.

5 Q. Which is the same time period as the  
6 presentation that we were just looking at when  
7 the Business Council was considering potential  
8 revisions to RSAs involving non-Samsung OEMs,  
9 right?

10 A. I'm sorry. Can you please repeat  
11 that?

12 Q. Sure. This is the same time period,  
13 the same time date, really, when the Business  
14 Council was considering potential changes to  
15 RSAs involving non-Samsung OEMs?

16 A. Correct.

17 Q. And it appears as if you were  
18 chatting with Mr. Herring about this proposal,  
19 right?

20 A. Correct.

21 Q. And in the fourth sort of chat down  
22 the sequence, you say, "i have a tough time  
23 seeing the return on the incremental  
24 investment." And unfortunately there's sort  
25 of -- it looks like there's something

1 Porat - Highly Confidential  
2 interposed, but it says, "in christian's brief  
3 note, it is tough to see. What is it?" Do you  
4 see that?

5 A. Yes.

6 Q. And a little bit further down  
7 Mr. Herring responds, "the incremental  
8 investment for play is around mitigating a  
9 broader risk - the lack of success in the  
10 current structure is the alarm bell." Do you  
11 see that?

12 A. Yes.

13 Q. You respond by saying, "i am asking  
14 about the request now -- the GDAF." Do you see  
15 that?

16 A. Yes.

17 Q. What does GDAF stand for?

18 A. I have no idea sitting here today.

19 Q. Are you familiar with the term  
20 Google Distribution on the Android Framework?

21 A. I don't, but that would match the  
22 letters, but I otherwise don't.

23 Q. Do you recall the GDAF is analogous  
24 to RSA 3.0?

25 A. I don't.



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[illegible]

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12 MR. POMERANTZ: Objection to the  
13 form of the question.

14 A. It looks like it is a response.

15 Q. And is that something that you would  
16 have considered as part of your consideration  
17 of the proposed revisions to the RSAs to non-  
18 Samsung OEMs?

19 A. Again, I don't recall this, so I'm  
20 having a hard time knowing how it was used.

21 Q. It's true, is it not, that Huawei  
22 and the Chinese OEMs had built Android app  
23 stores for use in China?

24 A. I -- again, I wasn't close enough to  
25 it. I don't recall that.

1 Porat - Highly Confidential

2 Q. [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 A. The same, I would be responding  
7 based on what I'm reading here today.

8 Q. Do you have any recollection of that  
9 concern at all?

10 A. I'm trying to recall the -- you  
11 know, I think that in the most general of terms  
12 but nothing I can really elaborate on.

13 Q. [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 Q. And the revisions that were being  
23 proposed to the RSAs and non-Samsung OEMs were  
24 designed to avoid the risks that Mr. Herring is  
25 describing here, correct?



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Q. Which includes avoiding developers or OEMs no longer using Play, correct?

MR. POMERANTZ: Objection to the form.

A. Play -- developers continuing to use Play is part of what, you know, I think of, we think of, as supportive of a healthy Android ecosystem.

Q. And so you understood Mr. Herring here to be expressing his views as to why these revisions to the RSAs for non-Samsung OEMs were necessary, correct?

A. Again, I don't recall this exchange, but sitting here reading it today that's the back and forth.

Q. And do you recall that the Business Council, following this presentation and following your exchange with Mr. Herring, approved the proposed revisions to the RSA in

1 Porat - Highly Confidential

2 June of 2019?

3 A. I sitting here today, do not recall  
4 that. I do not recall that it didn't or did.  
5 I don't recall either way.

6 Q. Let's look at a document to see if  
7 it refreshes your recollection.

8 MR. CAMERON: So can we mark as an  
9 exhibit, I think this is going to be  
10 Plaintiff's Exhibit 1613.

11 (Whereupon Exhibit 1613 was marked  
12 for identification.)

13 Q. Let me know when you have it.

14 A. It's open.

15 Q. This is a document that at the top  
16 is "BC Deal Review Meeting Notes (2019)," and  
17 it's a document bearing Bates stamp GOOG-PLAY  
18 1139717 through 1139774. You've got the  
19 document in front of you, ma'am?

20 A. I do. I'm just scrolling it to the  
21 end. If you want me to confirm that. I will  
22 take your word for the final page.

23 Q. Yes. So this appears to be a  
24 reference, as it says at the top, or if you  
25 like a summary of BC deal review meeting notes

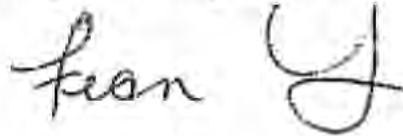
## C E R T I F I C A T E

I, FRAN INSLEY, hereby certify that the Deposition of RUTH PORAT was held before me on the 15th day of September, 2022; that said witness was duly sworn before the commencement of testimony; that the testimony was taken stenographically by myself and then transcribed by myself; that the party was represented by counsel as appears herein;

That the within transcript is a true record of the Deposition of said witness;

That I am not connected by blood or marriage with any of the parties; that I am not interested directly or indirectly in the outcome of this matter; that I am not in the employ of any of the counsel.

IN WITNESS WHEREOF, I have hereunto set my hand this 16th day of September, 2022.



---

FRAN INSLEY

# **EXHIBIT C2**



**FILED UNDER SEAL**

**EXHIBIT NO. 25**

## Message

From: Mike Herring [REDACTED]  
 Sent: 6/20/2019 6:06:49 PM  
 To: Ruth Porat [REDACTED]

- Mike Herring, 2019-06-20 11:06:49

[REDACTED]

- Ruth Porat, 2019-06-20 11:07:00

thanks

- Mike Herring, 2019-06-20 11:07:50

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Ruth Porat, 2019-06-20 11:12:49

ask

- Mike Herring, 2019-06-20 11:14:16

the incremental investment for play is around mitigating a broader risk - the lack of success in the current structure is the alarm bell

- Ruth Porat, 2019-06-20 11:14:43

i am asking about the request now -- the GDAF q

- Mike Herring, 2019-06-20 11:14:58

If we don't align incentives on the Play store, we believe there is a non-zero risk of the following scenario materializing: [REDACTED]

[REDACTED]

[REDACTED]

- Ruth Porat, 2019-06-20 11:15:00

are you on the BC call? cant see on gvc

- Mike Herring, 2019-06-20 11:15:04

I know that is a lot

- Mike Herring, 2019-06-20 11:15:11

I am, I am in dofa

- Mike Herring, 2019-06-20 11:15:17

**Exhibit  
PX 1612**

sofia

- **Ruth Porat**, 2019-06-20 11:16:15

you are responsible for a complicated area! any concerns about this deal?

- **Mike Herring**, 2019-06-20 11:16:47

concerns are about android, this deal is aggressive but i think it is the right approach

- **Mike Herring**, 2019-06-20 11:16:57

the changes to core and optimized are smart

- **Mike Herring**, 2019-06-20 11:17:12

yes, very complicated, but fun!

- **Ruth Porat**, 2019-06-20 11:17:13

at our next 1-1, great if we can spend more time on it.

- **Ruth Porat**, 2019-06-20 11:17:24

it being this proposal.

- **Mike Herring**, 2019-06-20 11:17:28

sg

- **Ruth Porat**, 2019-06-20 11:17:36

i will approve today but there certainly seem to be a lot of moving parts!

- **Mike Herring**, 2019-06-20 11:17:57

yes

- **Mike Herring**, 2019-06-20 11:18:05

philipp likes it

- **Ruth Porat**, 2019-06-20 11:18:13

good.

# **EXHIBIT C3**

**FILED UNDER SEAL**

**EXHIBIT NO. 26**

Message

---

From: [REDACTED]  
To: [REDACTED]  
Subject: Chat with [REDACTED]

me: Hi there

teckyanglee: hi

teckyanglee: how are you?

me: Saw you ping. Sorry I didn't get a chance to reply

teckyanglee: you are making headlines. :)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

me: The same thing that happened with Java where Sun started to take advantage its position with Java is happening here now

me: sigh....

teckyanglee: you are going to write a long blog about it, right?

teckyanglee: like James Whittaker

teckyanglee: want me to check if there is something here?

me: Sure

me: Every bit help

me: Something Appstore related? I guess?

teckyanglee: ok

teckyanglee: i am not familiar with the product marketing side of things but I can ask around

me: Thanks

me: How are you doing?

me: Still working crazy hours?

teckyanglee: ok

teckyanglee: no crazy hours, but I am going crazy myself

me: How come?

teckyanglee: keep forgetting things

teckyanglee: getting old

me: I think I'm still older than you....

me: But I know what you mean by getting old....

teckyanglee: i just don't like the fact that I am losing track of things

teckyanglee: :D

me: You have an iphone to help you....

me: You mean Siri is not smart enough?

teckyanglee: not when i forget to ask siri to help

me: hmmm, that is very serious then....

teckyanglee: so you are product marketing for the android market

teckyanglee: is that a correct description?

me: I ran business and content recruitment for Android Market

me: Also merchandising

me: Also content abuse operation and developer support

teckyanglee: i will ask around

teckyanglee: at least now you can relax for a bit

teckyanglee: you would to do hardware marketing?

me:

[REDACTED]

would work, too

teckyanglee: so angana and kenneth do not report to you anymore?

me: No. Angana moved into product management

me: Kenneth takes over one part of what I've been doing

teckyanglee: ok...i will let you know if I find something

me: Thanks

teckyanglee: lunch someday?

me: Sure. I'm open later part of next week. Or we can aim for the weekend also

teckyanglee: next 2 weekends will be busy

teckyanglee: we can figure something out later

me: ok